

ELECTRONICALLY FILED
Pulaski County Circuit Court
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STATE OF ARKANSAS * COUNTY OF PULASKI* CIRCUIT COURT

FIRST BAPTIST CHURCH,
through its Pastor and Board Members
Deacon Dr. Victor Williams and Dr. William Rutledge

PLAINTIFF

VS. NO.: _____

CHURCH MUTUAL INSURANCE COMPANY

DEFENDANT

COMPLAINT

NOW INTO COURT, through undersigned counsel, comes Plaintiff **FIRST BAPTIST CHURCH** through, a non-profit organization situated in the city of Little Rock, County of Pulaski, State of Arkansas, who avers as follows:

1.

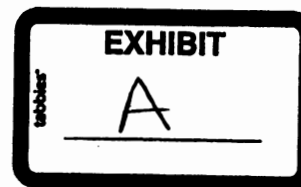
That This Court Has Jurisdiction Over This Matter And Venue Is Proper.

2.

First Baptist Church, located in Little Rock of Arkansas, is a religious organization containing a number of members and also represented by a board comprised of Dr. Victor Williams and Dr. William Rutledge. The board members are authorized to make decisions for the church.

3.

The Defendant, **CHURCH MUTUAL INSURANCE COMPANY**, a corporation doing business in the state of Arkansas, and at all times relevant to this action.



4.

The Defendant was Plaintiff's Insurance Company and this matter stems from damage to the roof of First Baptist Church, which was caused by wind and hail storms.

5.

The Defendant, **CHURCH MUTUAL INSURANCE COMPANY**, had been an insurer of the Plaintiff for over twenty (20) years and had a contractual obligation with the Plaintiff to repair issues that are present here. Plaintiff asserts that the Defendant has breached their Contract and duty to perform under the contract.

6.

On or about August 15, 2016, the Plaintiff, through its board members on behalf of the church, made a claim with the Defendant in order to have repairs made to its roof, as it leaked rain water.

7.

Plaintiff was insured by Defendant, **CHURCH MUTUAL INSURANCE COMPANY** at all times related to this cause of action.

8.

The Plaintiff suffered damages to the church building as a result of storm damages to the roof of the church building.

9.

Plaintiff have made amicable demand on the Defendant to make repairs for damages sustained to the roof of **FIRST BAPTIST CHURCH**, without resolve.

10.

Defendant **CHURCH MUTUAL INSURANCE COMPANY**, refused to fully compensate Plaintiff in order to repair the church roof.

11.

Plaintiff reserve the right to amend the Complaint as deemed necessary.

WHEREFORE, PLAINTIFF prays that Defendant **CHURCH MUTUAL INSURANCE COMPANY**, be served with a certified copy of this Complaint, and after all proceedings, there be a judgment in favor of Plaintiff against the Defendant for all damages including damages which Plaintiff alleged is sufficient for the purposes of a trial and with legal interest from the date of judicial demand until finally paid.

FURTHER PRAYS that the Defendant **CHURCH MUTUAL INSURANCE COMPANY**, be held liable for all damages to the Plaintiff and all costs of these proceedings and any other legal and equitable relief as the Court shall deem necessary and proper.

Respectfully Submitted

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SERVICE REQUESTED

Church Mutual Insurance Company
through
Corporation Service Company
300 Spring Building, Ste. 900
300 S. Spring Street
Little Rock, Arkansas 72201

By: /S/ Danyelle J. Walker
Danyelle Walker Bar No.: 95-234
ATTORNEY FOR PLAINTIFF